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### **REMARKS/ARGUMENTS**

This Amendment is in response to the Office Action mailed May 2, 2005, in which Claims 1-12 were rejected. Applicants would like to thank the Examiner for a timely and thorough review of the above-referenced patent application. Applicants have amended independent Claims 1, 3, 4, and 8 to more clearly describe the invention, as explained in more detail below. It is respectfully submitted that in light of the arguments and claim amendments, the application is now in condition for allowance.

#### **Rejections Under 35 U.S.C. § 101**

The Office Action rejected Claims 1-12 under 35 U.S.C. § 101 as claiming the same invention as that of claims 1-12 of U.S. Patent No. 6,341,261 to Vasey-Glandon, et al. ("the Vasey-Glandon '261 patent"), from which the present invention claims priority as a Continuation-In-Part. Claims 1-12 of the present invention were alleged to be identical in scope and verse to the corresponding claims of the Vasey-Glandon '261 patent. To the extent that this rejection would be applied against the claims as amended, Applicants respectfully traverse.

Independent Claims 1, 3, 4, and 8 have been amended to recite a starting definition point for determining connectivity that is defined by a connection point of a substructure portion to the laminate part or to a second substructure portion, as supported by the application at page 31, lines 16-25. The claims of the Vasey-Glandon '261 patent do not recite the use of a starting definition point for the connectivity determinations. For at least this reason, Applicants respectfully submit that Claims 1-12 as amended are not identical in scope and verse to the claims of the Vasey-Glandon '261 patent. Accordingly, Applicants respectfully submit that the rejection of Claims 1-12 for double patenting is successfully traversed.

#### **Rejections Under 35 U.S.C. § 103(a) – Campestre, et. al in view of Morelle, et. al**

The Office Action rejected Claims 1-12 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,220,743 issued to Campestre et al. ("the Campestre '743 patent"), et al. in view of "CAD Based Optimization of Composite Structures," P. Morelle, et al., Proceedings of

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Sixth Int. Conference on OPTI, March 16-18, 1999, pgs. 311-320 ("the Morelle article"). To the extent that this rejection would be applied against the claims as amended, Applicants respectfully traverse.

As stated above, independent Claims 1, 3, 4, and 8 have been amended to recite a starting definition point for determining connectivity that is defined by a connection point of a substructure portion to the laminate part or to a second substructure portion. Applicants respectfully submit that neither the Campestre '743 patent nor the Morelle article teaches or suggests a starting definition point for determining connectivity that is defined by a connection point of a substructure portion to the laminate part or to a second substructure portion.

The Campestre '743 patent discloses a computer-implemented knowledge-based system for the selection of materials and fabrication processes consisting of a graphical user interface, an expert system shell, and a models and database program. The Campestre '743 patent does not teach knowledge-based design optimization of laminate structures. The reference does not teach or disclose laminate parts, substructures, or interfaces defined by the connection between substructures and laminate parts or other substructures.

The Morelle article discloses a composite design optimization process that generates a globally optimized 3-D ply definition for a laminate part, optimizes the 3-D ply definition, subsequently generates a feedback signal, modifies the 3-D ply definition responsive to the feedback signal, and includes other features enumerated by the Examiner. The Morelle article does not teach or disclose substructures or determining connectivity between substructure portions and laminate parts or other substructure portions.

Therefore, Applicants respectfully submit that amended Claims 1, 3, 4, and 8, and the claims that depend therefrom, are not obvious in light of the Campestre '743 patent in combination with the Morelle article. Accordingly, Applicants respectfully submit that Claims 1-12 are patentable over the Campestre '743 patent and the Morelle article and respectfully request that the rejection of Claims 1-12 be withdrawn.

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**CONCLUSION**

In view of the foregoing remarks, Applicants respectfully submit that all of the Claims of the present application are in condition for allowance. It is respectfully requested that a Notice of Allowance be issued in due course. Examiner Ferris is encouraged to contact Applicants' undersigned attorney to resolve any remaining issues in order to expedite examination of the present application.

It is not believed that fees for extensions of time or for net addition of claims are required. However, in the event that additional extensions of time or fees for net addition of claims are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fees required are hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,

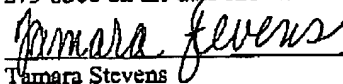


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**CERTIFICATION OF FACSIMILE TRANSMISSION**

I hereby certify that this paper is being facsimile transmitted to the US Patent and Trademark Office at Fax No. (571) 273-8300 on the date shown below.

  
Tamara Stevens

  
Date

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